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COMMUNICATIONS  
CORPORATION

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

May 4, 1993

Secretary Searcy  
FCC Commission  
1919 M Street, N.W.  
Washington, DC 20554

Dear Secretary Searcy:

Enclosed is EMI Communications Corporation ex-parte presentation given by Mr. William R. Lye to Dr. Thomas Stanley at the Office of Engineering and Technology on April 28, 1993.

This presentation discussed EMI's comments and reply comments on FCC Docket 92-9.

Sincerely,

William R. Lye  
Director of FCC

smh

Enclosure

(FCC-008.doc)

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**EMI COMMUNICATIONS CORPORATION**

POSITION ON  
FCC DOCKET 92-9

**EMERGING TECHNOLOGIES**

PRESENTED TO THE OFFICE  
OF ENGINEERING  
AND TECHNOLOGY  
ON APRIL 28, 1993

BY

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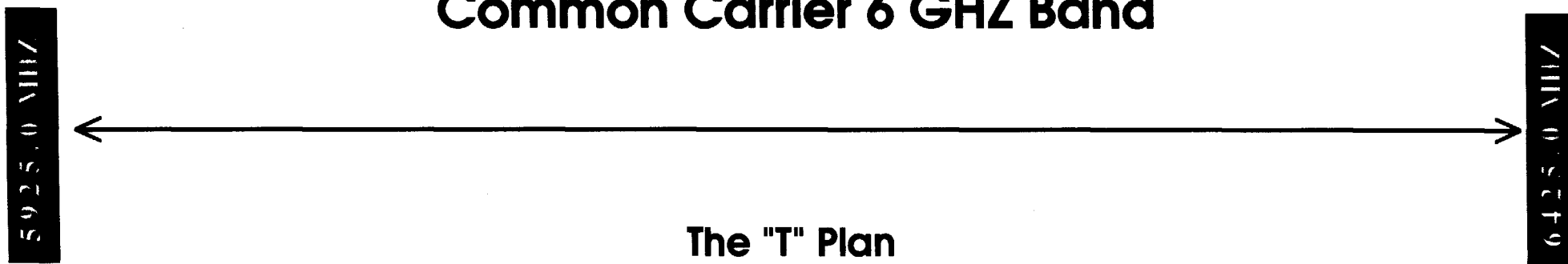
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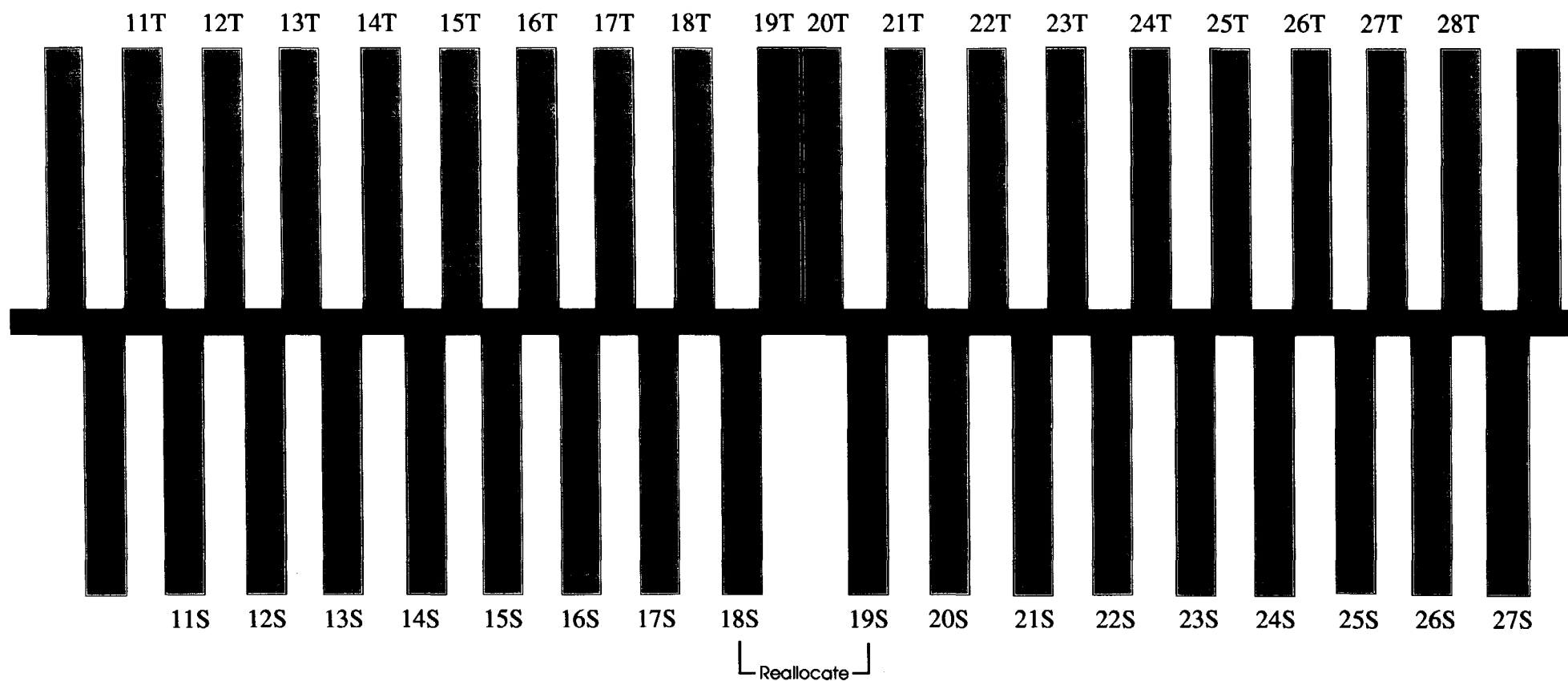
- **Alternate spectrum in the 2 GHz range may become available**
  - Displaced 2 GHz users could retune current equipment to utilize the 2 GHz government band at minimal cost
- **Co-primary license status**
  - Incumbent 2 GHz users should share primary status with an emerging technology provider for 10-15 years
  - Financial negotiations for early migration are essential
- **The protection of growth frequencies cannot be sacrificed**
  - Growth frequency protection for microwave based IXC's is critical
  - The Prior Coordination Notice process minimizes spectrum warehousing
- **Narrow band signals in a wide band environment**
  - Guard bands are ideally suited for narrow band signals
  - To promote spectral efficiency, narrow band signals should always reside at the band

Example A

## Common Carrier 6 GHZ Band



### The "T" Plan



### The Staggered or "S" Plan